

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.
Jerry PEREZ

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 15, 2021 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

8 USC 1324

Offense Description

Knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, did transport and move and attempted to transport and move and conspired to transport and move such alien within the United States by means of transportation and otherwise in furtherance of such violation of law.

This criminal complaint is based on these facts:

Continued on Affidavit

☒ Continued on the attached sheet.

/S/Mario Villanueva

Submitted by reliable electronic means per Fed.R.Crim.P. 4.1, Maio Villanueva sworn to and signature attested telephonically on January 19, 2021, at Laredo, Texas.


Christopher dos Santos
United States Magistrate Judge

AFFIDAVIT

In support of Criminal Complaint

UNITED STATES OF AMERICA**CRIMINAL COMPLAINT****V.**

Jerry PEREZ

Case Number:

1. On January 15, 2021, a Border Patrol Agents (BPA) working the United States Border Patrol Checkpoint located approximately 29 mile marker of Interstate Highway 35 (IH-35) near Laredo, Texas in Webb County arrested Jerry PEREZ for transporting one illegal alien further into the United States.
2. At approximately 6:05 p.m., a red in color Cadillac ATS approached the Border Patrol Checkpoint with two visible occupants to be inspected by the BPA on duty. As the vehicle approached the primary lane, BPA observed the driver appearing to be nervous and unwilling to make eye contact. BPA asked the driver, later identified as Jerry PEREZ, if he was a United States Citizen to which he replied, "yes". BPA then asked the passenger later identified as Karina URIBE-Medrano as to her citizenship but she did not answer. BPA then asked URIBE-Medrano for her identification but PEREZ replied for her and stated she had lost it. BPA asked URIBE-Medrano biographical information but URIBE-Medrano did not seem to understand. BPA asked URIBE-Medrano if she spoke Spanish to which she replied, "yes". The BPA continued his interview and asked URIBE-Medrano in the Spanish language where she was born, to which she replied, "San Antonio". BPA then asked URIBE-Medrano what hospital she was born in, but URIBE-Medrano avoided eye contact and was unable to reply. Both subjects were taken into custody for suspicion of alien smuggling and escorted inside the checkpoint for further investigation. Once inside the checkpoint, URIBE-Medrano freely admitted to being in the United States illegally. Both subjects were placed under arrest.
3. **PRINCIPAL STATEMENT:** Jerry PEREZ, a United States Citizen, was provided his Miranda Rights to which he acknowledged and understood them by signing service form I-214. PEREZ was willing to provide a statement without an attorney present. PEREZ stated he gave the passenger URIBE-Medrano a ride and was going to transport her to San Antonio, Texas. PEREZ stated he did the favor for a family member but did not know URIBE-Medrano. PEREZ stated this was his first attempt in smuggling and thought it was going to be easy. PEREZ stated he knew URIBE-Medrano was illegally in the United States and that it is illegal to transport illegal aliens through the checkpoint. PEREZ stated he did not receive any money to transport URIBE-Medrano.
4. **MATERIAL WITNESS STATEMENT:** URIBE-Medrano, a citizen of Mexico, stated she crossed into the United States (U.S.) on January 14, 2021 with six subjects. URIBE-Medrano stated she paid \$2,000.00 United States Dollars (USD) to a subject in Mexico and was going to pay a total of 6,000.00 USD when she reached her final destination of Dallas, Texas. URIBE-Medrano stated after crossing into the U.S., she walked for an hour until she along with the six subjects were picked up by an unknown person driving an unknown vehicle. URIBE-Medrano stated she was transported to an empty house and stayed there for the remainder of the night until the following day (January 15, 2021). URIBE-Medrano stated the following day an unknown person transported her to a different house where she was provided with new clothes to wear. URIBE-Medrano stated she was then transported in another vehicle by an unknown person to a store's parking lot. URIBE-Medrano stated she was instructed by the driver of that vehicle not to get nervous when she arrived at the checkpoint. URIBE-Medrano stated that the unknown person also instructed her that when asked by an Immigration Officer if she is a United States Citizen to reply "yes". URIBE-Medrano stated the same unknown person while in the store's parking lot instructed her to get in a red vehicle that was parked in the same parking lot. URIBE-Medrano stated she entered the red vehicle and the driver (PEREZ) was in the driver's seat. URIBE-Medrano stated that the driver (PEREZ) did not talk to her at all while they drove to the Checkpoint. URIBE-Medrano was presented with a six-person photo line-up to which she positively identified Jerry PEREZ as the driver of the vehicle she was arrested in.

SUBSCRIBED and SWORN to before me on

19th day of January, 2021

Signature of Judicial Officer

/S/ Villanueva, Mario Border Patrol Agent
Signature of Complainant